REMARKS

Claims 1-7 are pending. Claims 1-7 are rejected under 35 U.S.C. §103(a) as being unpatentable over Moriyama (U.S. Patent No. 4,680,647) in view of Walther, et al. (U.S. Patent No. 5,606,648). Applicant respectfully disagrees.

The combination of Moriyama would teach the use of a start and stop code to 'turn on' sub-pixel modulation directed to density enhancement of a printed image. Density enhancement is a process by which an image is increased in its number of pixels. See Walther, column 2, lines 27-40. The density enhancement in Walther is directed to eliminating the use of two clock signals, using instead a multi-phase clock generator. The density enhancement basically creates a uniform pattern of pixels between the existing pixels in the image data, and would be the same for any print engine capable of being 'highly addressable.' See Walther, column 10, lines 35-42.

Applicant's invention as claimed, in contrast, creates a pattern that allows determination of the print engine that produced the output. The pattern is created by a sub-pixel modulation that could be thought of as positional modulation, rather than density modulation. The combination of Walther and Moriyama would teach density modulation, where the density of the dots is modulated to produce a uniform, higher-resolution image. Applicant's invention as claimed teaches positional modulation at a higher resolution to create a sub-visual pattern that identifies the print engine.

Applicant therefore submits that the combination does not teach "modulating said subpixel modulation process in accordance with a code, wherein said code alters the placement of the spots to produce a sub-visual pattern identifying a print engine..." as is required by Applicant's claim 1. Therefore, Applicant submits that claim 1 is patentably distinguishable over the prior art and requests allowance of this claim.

Docket No. 8371-064   Page 3 of 4   Application No. 09/277,801

Claims 2-7 depend from claim 1 and should be ruled allowable for that reason and for their own merits. With regard to claim 3, the combination of references does not teach modulating the pattern that identifies a print engine between two levels of magnitude of modulation. Applicant submits that claim 3 is patentably distinguishable over the prior art and requests allowance of this claim.

With regard to claim 2, the combination of references does not teach repeating the code several times throughout the image where the code alters placement of the spots to produce a sub-visual pattern that identifies the print engine.

With regard to claims 4 and 5, the combination of reference does not teach two magnitudes of modulation in which each level of modulation creates a sub-visual pattern that identifies a print engine.

With regard to claims 6 and 7, the combination of references does not teach a start and stop code to indicate the beginning and end of the modulation process to alter the spot placement to identify a print engine. Therefore, Applicant submits that claims 2-7 are patentably distinguishable over the prior art and request allowance of these claims.

Allowance of all claims is requested. No new matter has been added by this amendment. The Examiner is encouraged to telephone the undersigned at (503) 222-3613 if it appears that an interview would be helpful in advancing the case.

Respectfully submitted,

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Docket No. 8371-064   Page 4 of 4   Application No. 09/277,801